

# Exhibit 20E

REXFORD C. KOSACK  
GLENN A. JEWELL  
DOUGLAS DALEY  
LAW OFFICES OF REXFORD C. KOSACK  
Bank of Hawaii Bldg., Third Floor  
P.O. Box 410  
Saipan, MP 96950  
Telephone: (670) 322-8800  
Fax: (670) 322-7800

Attorneys for Defendant Brian M. Chen

CARLSMITH BALL LLP

SEAN E. FRINK, F0212  
Carlsmith Building, Capitol Hill  
P.O. Box 5241  
Saipan, MP 96950-5241  
Tel No. 670.322.3455

BRUCE L. MAILMAN (CNMI Bar #F0153)  
MAYA B. KARA (CNMI Bar #F0169)  
Mailman & Kara, LLC  
PMB 238 PPP, Box 10,000  
Saipan, MP 96950  
Tel:(670)233-0081  
Fax: (670)233-0090

Attorneys for Defendants.  
OKP CNMI Corporation, Prasada  
Reddy Goluguri, Pramuan Jaiphakdee, &  
Wilai Promchai



**E-FILED**  
**CNMI SUPERIOR COURT**  
E-filed: Oct 26 2007 04:45PM  
Clerk Review: Oct 30 2007 4:36PM  
Filing ID: 16883385  
Case Number: 06-0119-CV  
Rosie D. Danna

IN THE SUPERIOR COURT

OF THE

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

JOAQUIN Q. ATALIG,

Plaintiff,

vs.

OKP (CNMI) CORPORATION, *et al.*,

Defendants.

CIVIL ACTION NO. 06-0434

**DECLARATION OF PRASADA REDDY  
GOLUGURI IN SUPPORT OF  
MOTION FOR SUMMARY JUDGMENT**

1. I was employed by OKP CNMI Corporation ("OKP") as a project engineer related to the Rota Runway Extension Project and am a defendant in the case for which I am submitting this Declaration. I have personal knowledge of the matters stated herein, read and write the English language, and would be competent to testify to same if called upon to do so.

2. In December, 2005 the OKP Project Manager, Allen Yee, told me that a 100' x 150' area on the Atalig property needed to be cleared for a parking area for its equipment as well as a recreation area. The area Mr. Yee selected was behind, or west of, the former Sunrise Hotel. The Sunrise Hotel was located approximately mid-way along the eastern boundary of the property. I was told by Mr. Yee to have Pramuan Jaiphakdee do the clearing work with heavy equipment.

3. At the site, I told Pramuan that he is to clear an area 100' x 150'. To show him exactly where to clear, I measured out 100' one way on the property and 150' perpendicular to it (like the intersection of an X and Y axis) with Pramuan. Pramuan marked the width and the length by placing rocks and sticks at the starting and ending points. I told Pramuan this is the area to be cleared.

4. I am from India and Pramuan Jaiphakdee is Thai. We communicated in English. To ensure there would be no misunderstanding of my instructions, I instructed Pramuan to first clear a border around the perimeter of the 100' x 150' box for me to check. Pramuan scraped a 3' wide boundary line around the area to be cleared.

5. I inspected the boundary line and found it was in the right location and had the right dimensions. I then walked the perimeter of the box. I could clearly see all of the interior of the box during my walk around the perimeter. There was not a water tank or a taro patch in the box. The nearest point of the water tank that was subsequently to be damaged by Pramuan's clearing

1 was more than 80 feet away from the nearest point of the box. The A-frame, laundry, and bar

2 described in paragraphs 10 through 13 below were not within or near the box.

3 6. I went to Mr. Yee to get approval for Pramuan to begin clearing the area within the box.

4 Mr. Yee gave his approval, which I communicated to Pramuan.

5 7. I later noticed that Pramuan had cleared an area bigger than the box by pushing debris

6 outside of it.

7 8. One of the areas outside of the box that Pramuan had pushed the debris into was adjacent

8 to what I soon learned was a concrete water tank at about the center of the Atalig property and

9 located just east of an unimproved roadway going through the lot in an arc starting near the

10 northeast corner and ending in the southeast corner. This was the area Mr. Atalig subsequently

11 claimed contained latte stones, a mortar and pestle, a concrete water tank, a concrete foundation,

12 a small low wall, a washing basin and stand, and trees that were destroyed.

13 9. Another area outside of the box that Pramuan pushed the debris into was in the area of a

14 taro patch and is situated just northeast of the center of the Atalig property and just south of the

15 northern part of the unimproved roadway described in the previous paragraph. This was the area

16 that Mr. Atalig subsequently claimed contained latte stones that were destroyed.

17 10. There was a one-room tin shack located on the Atalig Property. The tin shack, which I

18 understand Mr. Atalig refers to as a "dirty kitchen" or "laundry," was not located in or near the

19 area that Pramuan cleared and was not damaged by the clearing. Subsequent to my arrival on the

20 property the tin shack was disassembled. I did not participate in the disassembly of the shack

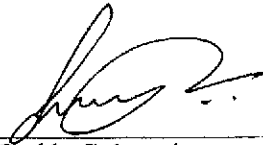
21 and did not authorize the disassembly of the shack.

22 11. There was also immediately adjacent to the tin shack an A-frame structure that was

23 damaged before I arrived in Rota. I was among the first group of OKP people to come on the

1 property. The A-frame structure was not damaged by Pramuan's clearing. I did not participate  
2 in damaging the A-frame and did not authorize any such acts.  
3 12. I did not take any items from the A-frame, shack, or kitchen and did not authorize anyone  
4 else to do so.

5 I declare the foregoing to be true under penalty of perjury in SINGAPORE, on  
6 October 16, 2007.  
7

8  
9   
10 \_\_\_\_\_  
11 Prasada Reddy Goluguri